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July 1, 2020

Via ECF

Hon. Barbara Moses, U.S.M.J.
USDC NYSD
40 Foley Square
New York, NY 10007

MEMO ENDORSED

Re: Letter Motion Requesting an Extension of Time to Oppose Famous Sichuan Defendants' Cross-Motion for Summary Judgment to July 8 from July 1 Pending Defendants' Overdue Discovery Responses
19-cv-07332 Ke v. JR Sushi 2, Inc. et al

Your Honor,

This office represents Plaintiff in the above-referenced matter. Plaintiff respectfully writes, with Famous Sichuan Defendants' consent, to request a seven (7) day extension from July 1, 2020 to July 8, 2020 to file our Opposition to Famous Sichuan Defendant's Cross-Motion for Summary Judgment and our Reply in Further Support of Plaintiff's Motion for Conditional Collective Certification.

The extension is necessary because Defendants have failed to provide their responses to Plaintiff's Discovery Demands originally due on June 26, 2020. Plaintiff has consented to a one-week extension to July 3, 2020 for Defendants to produce their response. As such, Plaintiff needs time to review Defendant's discovery responses to more adequately respond to Defendant's cross-motion.

We thank the Court for its time and consideration in this matter and sincerely apologizes for any inconveniences caused to this Court.

Respectfully Submitted,

/s/ John Troy
John Troy

JT//af

Application GRANTED. SO ORDERED.



Barbara Moses, U.S.M.J.
July 1, 2020